1 THE HONORABLE RICHARD A. JONES THE HONORABLE MARY ALICE THEILER 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 RHONDA BROWN, a Washington resident,) 10 Plaintiff, Case No. 2:19-cv-01459-RAJ-MAT 11 v. STIPULATION AND (PROPOSED) ORDER OF DISMISSAL WITH 12 MOORE HOTEL, INC., a Washington **PREJUDICE** corporation and owner of the Moore Theatre, 13 SEATTLE THEATRE GROUP, a Washington corporation and operator of the NOTE ON MOTION CALENDAR: 14 PARAMOUNT THEATRE and the MOORE MARCH 27, 2020 THEATRE, 15 Defendants. 16 IT IS HEREBY STIPULATED AND AGREED BY THE PARTIES, by and through 17 their respective counsel of record, that all claims asserted by Plaintiff against Defendants in the 18 above-captioned matter shall be dismissed with prejudice and without attorneys' fees or costs to 19 any party. 20 DATED this 27th day of March, 2020. 21 WASHINGTON CIVIL & DISABILITY LANE POWELL PC 22 ADVOCATE 23 By: <u>s/ Michael T. Kitson</u>
D. Michael Reilly, WSBA No. 14674 By s/Conrad Reynoldson (with auth. given) 24 Conrad Reynoldson, WSBA #48187 conrad@wacda.com Michael T. Kitson, WSBA No. 41681 25 4115 Roosevelt Way NE, Suite B 1420 Fifth Avenue, Suite 4200 Seattle, WA 98105 P.O. Box 91302 26 Telephone: (206) 876-8515 Seattle, WA 98111-9402 Telephone: 206.223.7000 Attorneys for Plaintiff 27 Facsimile: 206.223.7107 -And-LANE POWELL PC STIPULATION AND (PROPOSED) ORDER OF DISMISSAL 1420 FIFTH AVENUE, SUITE 4200 WITH PREJUDICE - 1 P.O. BOX 91302 SEATTLE, WA 98111-9402 CASE NO. 2:19-CV-01459-RAJ-MAT 206.223.7000 FAX: 206.223.7107 127192.0005/8018427.1

Case 2:19-cv-01459-RAJ-MAT Document 13 Filed 03/27/20 Page 2 of 5

| 1 | | Email: reillym@lanepowell.com Email: kitsonm@lanepowell.com |
|---------|--|---|
| 2 | | Attorneys for Defendants Moore Hotel, Inc and Seattle Theatre Group |
| 3 | | |
| 4 | | |
| 5 | REED PRUETT WALTERS LARSEN PLLC | |
| 6 | By <u>s/Mark D. Walters (with auth. given)</u> Mark D. Walters, WSBA #25537 | |
| 7 | Mark D. Walters, WSBA #25537 <u>mwalters@rpwlawfirm.com</u> 11120 NE 2nd St, Suite 200 | |
| 8 | Bellevue, WA 98004 | |
| 9 | Telephone: (425) 688-7620 Attorneys for Plaintiff | |
| 10 | | |
| 11 | | |
| 12 | | |
| 13 | | |
| 14 | | |
| 15 | | |
| 16 | | |
| 17 | | |
| 18 | | |
| 19 | | |
| 20 21 | | |
| 22 | | |
| 23 | | |
| 24 | | |
| 25 | | |
| 26 | | |
| 27 | | |

STIPULATION AND (PROPOSED) ORDER OF DISMISSAL WITH PREJUDICE - 2 CASE NO. 2:19-CV-01459-RAJ-MAT

LANE POWELL PC 1420 FIFTH AVENUE, SUITE 4200 P.O. BOX 91302 SEATTLE, WA 98111-9402 206.223.7000 FAX: 206.223.7107

(PROPOSED) ORDER 1 Pursuant to the foregoing Stipulation, IT IS HEREBY ORDERED that all claims in the 2 3 above-captioned lawsuit are DISMISSED with prejudice and without attorneys' fees or costs to any party. 4 5 DATED this ______, 2020. 6 7 HONORABLE MARY ALICE THEILER 8 UNITED STATES MAGISTRATE JUDGE 9 Presented by: 10 LANE POWELL PC 11 By: s/ Michael T. Kitson_ 12 D. Michael Reilly, WSBA No. 14674 Michael T. Kitson, WSBA No. 41681 13 1420 Fifth Avenue, Suite 4200 P.O. Box 91302 14 Seattle, WA 98111-9402 Telephone: 206.223.7000 15 Facsimile: 206.223.7107 Email: reillym@lanepowell.com 16 Email: kitsonm@lanepowell.com Attorneys for Defendants Moore Hotel, Inc. and 17 Seattle Theatre Group 18 19 WASHINGTON CIVIL & DISABILITY ADVOCATE 20 By s/Conrad Reynoldson (with auth. given) Conrad Reynoldson, WSBA #48187 21 conrad@wacda.com 4115 Roosevelt Way NE, Suite B 22 Seattle, WA 98105 Telephone: (206) 876-8515 23 Attorneys for Plaintiff 24 -And-25 26 27 LANE POWELL PC

STIPULATION AND (PROPOSED) ORDER OF DISMISSAL WITH PREJUDICE - 3 CASE NO. 2:19-CV-01459-RAJ-MAT

LANE POWELL PC 1420 FIFTH AVENUE, SUITE 4200 P.O. BOX 91302 SEATTLE, WA 98111-9402 206.223.7000 FAX: 206.223.7107

127192.0005/8018427.1

| 1 | DEED DDIJETT WALTEDGIADGEN DII G |
|----|---|
| 2 | REED PRUETT WALTERS LARSEN PLLC |
| 3 | By: s/ Mark D. Walters (with auth. given) Mark D. Walters, WSBA No. 25537 |
| 4 | mwalters@rpwlawfirm.com |
| 5 | 11120 NE 2nd St, Suite 200 Bellevue, WA 98004 |
| 6 | Telephone: (425) 688-7620 Attorneys for Plaintiff |
| 7 | |
| 8 | |
| 9 | |
| 10 | |
| 11 | |
| 12 | |
| 13 | |
| 14 | |
| 15 | |
| 16 | |
| 17 | |
| 18 | |
| 19 | |
| 20 | |
| 21 | |
| 22 | |
| 23 | |
| 24 | |
| 25 | |
| 26 | |
| | |

27

LANE POWELL PC 1420 FIFTH AVENUE, SUITE 4200 P.O. BOX 91302 SEATTLE, WA 98111-9402 206.223.7000 FAX: 206.223.7107

CERTIFICATE OF SERVICE 1 2 The undersigned certifies under penalty of perjury under the laws of the State of 3 Washington and the United States of America that on the 27th day of March, 2020, the document 4 attached hereto was presented to the Clerk of the Court for filing and uploading to the CM/ECF 5 system. In accordance with their ECF registration agreement and the Court's rules, the Clerk of 6 the Court will send e-mail notification of such filing to the following persons: 7 8 Conrad A. Reynoldson, WSBA #48187 Washington Civil & Disability Advocate 9 4115 Roosevelt Way NE, Suite B Seattle, WA 98105 10 Phone: (206) 876-8515 conrad@wacda.com 11 12 Mark D. Walters, WSBA #25537 13 Reed Pruett Walters Larsen PLLC 11120 NE 2nd St, Suite 200 14 Bellevue, WA 98004 Phone: (425) 688-7620 15 mwalters@rpwlawfirm.com 16 Executed on the 27th day of March, 2020, at Seattle, Washington. 17 18 s/ Kathi Milner 19 Kathi Milner, Legal Assistant 20 21 22 23 24 25 26 27

STIPULATION AND (PROPOSED) ORDER OF DISMISSAL WITH PREJUDICE - 5 CASE NO. 2:19-CV-01459-RAJ-MAT LANE POWELL PC 1420 FIFTH AVENUE, SUITE 4200 P.O. BOX 91302 SEATTLE, WA 98111-9402 206.223.7000 FAX: 206.223.7107